

**REMARKS/ARGUMENTS**

Reexamination of the captioned application is respectfully requested.

**A. SUMMARY OF THIS AMENDMENT**

By the current amendment, Applicants basically:

1. Editorially amend the specification.
2. Amend claims 1-13 and 18.
3. Respectfully traverse all prior art rejections.

**B. THE CLAIMS ARE DEFINITE**

The first paragraph on page 2 of the Detailed Action alleges that dependent claims 6 and 12 are indefinite because they include the phrase “types of user data”, alleged not to be disclosed in the specification. Applicants respectfully traverse, and point to, e.g., the paragraph extending from line 4 to line 10 of page 12 as providing sufficient disclosure. The types of user data shown in the embedded table of that paragraph include: Current location; prepaid account status; current mood; and various combinations of such types. It is therefore respectfully requested that the rejection under 35 USC §112, second paragraph, be withdrawn.

**C. PATENTABILITY OF THE CLAIMS**

Claims 1-8, 10-14 and 16-18 stand rejected under 35 USC §103(a) as being unpatentable over WO 01/28273 to Lammi et al in view of EP 1081916 to King. Claims 9 and 15 stand rejected under 35 USC §103(a) as being unpatentable over WO 01/28273 to Lammi et al in view of EP 1081916 to King and further in view of U.S. Publication 2003/0016823 to Chung. All prior art rejections are respectfully traversed for at least the following reasons.

In Lammi, a service request from a terminal user is received at a service gateway, the request being directed to a service provider. The request includes a user identifier, e.g. the user's MSISDN number. The service gateway protects the user identifier by encrypting the user identifier into an anonymous identifier, using an encrypting device, which thus corresponds to the user identifier. The service gateway then modifies the service request by substituting the user identifier by the anonymous identifier, before sending the request to the service provider.

The Lammi service provider then sends a location request, in effect a request for user data, to a location register, including the anonymous identifier. The location register "finds out" the corresponding user identifier from the encrypting device and makes a location query to the mobile network for the retrieved user identifier. The location register then returns geographical information to the service provider. Lammi thus involves at least three network nodes: the service gateway, the encrypting device, and the location register.

Applicant's independent claims patentably define over WO 01/28273 to Lammi et al, having distinctions such as the following::

- 1) Applicant's AUID code is a generated unique random code, whereas the anonymous identifier of Lammi is derived from the user identifier by encryption.
- 2) Applicant's AUID code represents the combination of a specific user and a specific service application, whereas the anonymous identifier of Lammi merely represents the user (contrary to the statement in the office action at the top of page 3).
- 3) Applicant's AUID code is used to determine whether the application is allowed to retrieve the requested user data, whereas no such allowance determination is disclosed whatsoever in Lammi (in Lammi the anonymous identifier is merely used to hide the user identifier to avoid exposure thereof).

These three above-listed distinctions particularly provide a solution to the problems of security and privacy outlined on page 4, 1<sup>st</sup> paragraph of the present application, since Applicant's AUID code is associated with the specific service application which thereby can be authorized to retrieve the requested user data when the code is included in the user data request.

The office action has properly admitted that the determining act (act D in original independent claim 1) is not disclosed by Lammi. However, the office action alleges that the phrase of step D) ["determining whether the application is allowed to retrieve the requested user data, and if so"] is disclosed by King.

With regard to the purported combination, the office action refers to the King abstract, and alleges it to be obvious to add that isolated part to the technique of Lammi. However, no clear support for this statement or suggestion for addition can be found in King. In fact, in contrast to Applicant's claims, Applicant surmises that King discloses a solution for restricting the release of user information to content servers based on a privacy agreement and not using any unique code for allowance. Applicant's technology is an effective alternative solution making such agreements (as in King) unnecessary.

Considering Applicant's independent claims as a whole, and given the combined effect of all its claimed features, the claimed structure and its benefits cannot be obtained simply by combining the two cited references. Thus, it is not obvious to assign a unique random code AUID to a specific user and a specific service application in combination, and to use this code for allowing that service application to retrieve user data of the specific user. It should be noted that the solution of Lammi would produce the same anonymous identifier for a specific user regardless of the involved services and/or service providers.

In view of the foregoing and other considerations, all claims are deemed in condition for allowance. It is respectfully requested that the prior art rejections be withdrawn and the application passed to issue.

**C. MISCELLANEOUS**

A formal indication of allowability is earnestly solicited.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

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